IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

)	
)	
)	
)	
)	
)	Civil Action No. 04 - 351E
)	
)	
)	
)	
)	
)	
))))))))

JOINT MOTION TO ESTABLISH DISCOVERY PERIOD AND TO CONTINUE HEARING SCHEDULED FOR MARCH 22, 2006

AND NOW come the United States of America and Khang Nguyen, by and through their respective counsel, and respectively represent as follows:

- 1. The parties will have until May 31, 2006, within which to conduct discovery and settlement negotiations.
 - 2. The hearing scheduled for March 22, 2006 is continued until further Order of Court.
- 3. Upon expiration of the discovery period, the parties shall report to the court on the status of their discovery and settlement negotiations, at which time a hearing will be rescheduled if necessary.
 - 4. This Stipulation is subject to the approval of the Court.

WHEREFORE, the United States of America and Khang Nguyen respectfully request that this Honorable Court order that the parties have until May 31, 2006, within which to conduct discovery.

Mary Beth Buchanan United States Attorney

By: s/Mary McKeen Houghton
Assistant U.S. Attorney
Suite 4000, U.S. Courthouse
700 Grant Street
Pittsburgh, PA 15219
(412) 894-7370
PA ID #31929

s/Gary E. Gerson
Attorney for Khang Nguyen

WHEREFORE, the United States of America and Khang Nguyen respectfully request that this Honorable Court order that the parties have until May 31, 2006, within which to conduct discovery.

Mary Beth Buchanan United States Attorney

By:

Assistant U.S. Attorney Suite 4000, U.S. Courthouse 700 Grant Street Pittsburgh, PA 15219 (412) 894-7370 PA ID #31929

Attorney for Khang Nguyen